

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	
)	CRIMINAL NO. 04-10060-RCL
GEORGE SCHUSSEL,)	
Defendant)	
)	

**UNITED STATES' MOTION TO EXCLUDE DEFENSE EXPERTS
CHARLES REILLY, ARNOLD ROSENFELD AND JAMES DINELL**

The United States hereby moves, in limine, to exclude the testimony of three experts on which the defendant, George Schussel ("Schussel"), has said he intends to rely. Schussel has disclosed three experts: (a) Charles Reilly, a tax attorney, (b) Arnold Rosenfeld, an attorney with expertise in legal ethics, and (c) James Dinell, a fax machine salesman and installer. The Court should exclude, or significantly limit, the proposed testimony of each of the proffered experts. As grounds for this motion, the United States says that none of the proposed testimony would assist the finder of fact in understanding the evidence or in resolving a fact in issue. The United States further sets forth the basis of this motion and additional grounds for exclusion of the proposed expert testimony in its memorandum in support filed simultaneously with this motion and incorporated herein.

WHEREFORE, the United States respectfully requests that the Court exclude, or

significantly limit, the proposed expert testimony of Charles Reilly, Arnold Rosenfeld and James Dinell.

Respectfully submitted,
MICHAEL J. SULLIVAN
United States Attorney

By:

/s/ Jack W. Pirozzolo
Carmen M. Ortiz
Jack Pirozzolo
Assistant U.S. Attorneys

Date: December 29, 2006

CERTIFICATE OF SERVICE

I, Jack W. Pirozzolo, hereby certify that on December 29, 2006 I served a copy of the foregoing by electronic filing on counsel for the defendant.

/s/ Jack W. Pirozzolo
Jack W. Pirozzolo

CERTIFICATE OF CONFERENCE

I, Jack W. Pirozzolo, hereby certify that on December 28, 2006, I spoke with counsel for the defendant in an attempt to resolve or narrow the issue raised in this motion. No agreement to resolve or further narrow the issues was reached.

/s/ Jack W. Pirozzolo
Jack W. Pirozzolo